

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

Brian D. Taylor,

Plaintiff,

v.

Civil Action No.: 21-cv-1354-LMB-IDD

Experian Information Solutions Inc.;  
Trans Union LLC;  
and  
Verizon Communications Inc.,

Defendants.

**STIPULATION AND PROPOSED ORDER  
FOR BINDING ARBITRATION AND TO  
STAY ALL PROCEEDINGS AGAINST DEFENDANT  
VERIZON COMMUNICATIONS INC. ONLY**

Plaintiff Brian D. Taylor (“Plaintiff”) and Defendant Verizon Communications Inc. (“Defendant” or “Verizon”), through their respective counsel of record, hereby stipulate as follows:

1. On or about December 3, 2021, Plaintiff filed a Complaint in the United States District Court for the eastern District of Virginia entitled *Brian D. Taylor v. Verizon Communications Inc., et al.*, Case Number 21-cv-1354-LMB-IDD. The Complaint asserts claims against Defendant for: (1) violation of § 1681s-2(b)(1)(A) and (B) Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (“FCRA”); (2) violation of § 1681s-2(b)(1)(C) and (D) of the FCRA; and (3) violation of § 1681s-2(b)(1)(E) of the FCRA.

2. Plaintiff previously allegedly entered into an agreement to arbitrate all disputes with Verizon. Without prejudice to any claims or defenses in this regard, pursuant to this alleged arbitration agreement, the Plaintiff and Verizon hereby stipulate to arbitrate this dispute through

the American Arbitration Association (“AAA”).

3. The parties also stipulate to stay the action **against Verizon only** pending completion of arbitration. This does not affect the remaining defendants.

**IT IS SO STIPULATED.**

Dated: April 5, 2022.

By: /s/ Leonard A. Bennett  
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Craig C. Marchiando, VSB #89736  
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Counsel for Defendant Verizon  
Communications, Inc.

**APPROVED AND SO ORDERED** this \_\_\_\_ day of April, 2022.

\_\_\_\_\_  
Leonie M. Brinkema  
United States District Judge